

FILED

JUN 28 2011

SUPERIOR COURT
CLERK'S OFFICE

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ607-11-4

Superior Court

Docket Number 11-06-00070-3

STATE OF NEW JERSEY)

v.)

GARY T. CRAMER)

INDICTMENT

and)

RACHAEL L. BAKER)

The Grand Jurors of and for the State of New Jersey, upon
their oaths, present that:

COUNT ONE

(Conspiracy - Second Degree)

GARY T. CRAMER

and

RACHAEL L. BAKER

between on or about November 28, 2010, and on or about January
22, 2011, in the Township of Winslow, in the County of Camden, in
the City of Bridgeton, in the County of Cumberland, elsewhere and
within the jurisdiction of this Court, with the purpose of
promoting or facilitating the commission of the crimes of

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Aggravated Sexual Assault and Endangering the Welfare of a Child,
did agree with each other, that:

A. One or more of them would engage in conduct which would constitute the aforesaid crimes or an attempt or solicitation to commit such a crimes; or

B. One or more of them would aid in the planning or commission of such crime or of an attempt or solicitation to commit such crime, that is:

1. Aggravated Sexual Assault, in that one or more of them would commit an act of sexual penetration with another person under the age of 13, namely A.B., contrary to the provisions of N.J.S.A. 2C:14-2, and

2. Aggravated Sexual Assault, in that one or more of them would commit an act of sexual penetration with another person, namely S.C., when said S.C. was at least 13 years old but less than 16 years old, and said S.C. was related to RACHAEL L. BAKER by blood or affinity to the third degree, contrary to N.J.S.A. 2C:14-2(a)(2)(a), and

3. Endangering the Welfare of a Child, in that one or more of them would cause or permit a child, namely A.B. and/or S.C., to engage in a prohibited sexual act or in the simulation of such an act, as defined by N.J.S.A. 2C:24-4(b)(1), knowing, having reason to know, or intending that the prohibited sexual act may be photographed, filmed, reproduced, or reconstructed in any

manner, including the Internet, or may be part of an exhibition or performance, contrary to the provisions of N.J.S.A. 2C:24-4(b)(3), and

4. Endangering the Welfare of a Child, in that one or more of them would photograph or film a child, namely A.B. and/or S.C., in a prohibited sexual act or simulation of such an act, as defined by N.J.S.A. 2C:24-4(b)(1), contrary to the provisions of N.J.S.A. 2C:24-4(b)(4).

5. Endangering the Welfare of a Child, in that one or more of them would knowingly give, provide, mail, deliver, transfer, distribute, circulate, or disseminate, through any means, including the Internet, a photograph, film, videotape, computer program or file, which depicted a child, namely A.B. and/or S.C., engaging in a prohibited sexual act or the simulation of such an act, as defined by N.J.S.A. 2C:24-4(b)(1), contrary to N.J.S.A. 2C:24-4(b)(5)(a).

6. Endangering the Welfare of a Child, in that one or more of them would engage in sexual conduct which would impair or debauch the morals of a child, namely A.B. and/or S.C., contrary to N.J.S.A. 2C:24-4(a).

All contrary to the provisions of N.J.S.A. 2C:5-2, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Aggravated Sexual Assault - First Degree)

GARY T. CRAMER

and

RACHAEL L. BAKER

between on or about November 28, 2010, and on or about January 22, 2011, in the Township of Winslow, in the County of Camden, in the City of Bridgeton, in the County of Cumberland, elsewhere and within the jurisdiction of this Court, did commit an act of sexual penetration with another person, namely A.B., when said A.B. was less than 13 years old, contrary to the provisions of N.J.S.A. 2C:14-2(a)(1), and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Aggravated Sexual Assault - First Degree)

GARY T. CRAMER

and

RACHAEL L. BAKER

between on or about November 28, 2010, and on or about January 22, 2011, in the Township of Winslow, in the County of Camden, in the City of Bridgeton, in the County of Cumberland, elsewhere and within the jurisdiction of this Court, did commit an act of sexual penetration with another person, namely S.C., when said S.C. was at least 13 years old but less than 16 years old, and said S.C. was related to RACHAEL L. BAKER by blood or affinity to the third degree, contrary to the provisions of N.J.S.A. 2C:14-2(a)(2)(a), and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Endangering the Welfare of a Child - Second Degree)

GARY T. CRAMER

and

RACHAEL L. BAKER

between on or about November 28, 2010, and on or about January 22, 2011, in the Township of Winslow, in the County of Camden, in the City of Bridgeton, in the County of Cumberland, elsewhere, and within the jurisdiction of this Court, did cause or permit a child, namely A.B. and/or S.C., to engage in a prohibited sexual act or in the simulation of such an act, as defined by N.J.S.A. 2C:24-4(b)(1), when said GARY T. CRAMER and RACHAEL L. BAKER, knew, had reason to know, or intended that the prohibited act may be photographed or filmed, contrary to the provisions of N.J.S.A. 2C:24-4(b)(3) and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Endangering the Welfare of a Child - Second Degree)

GARY T. CRAMER

and

RACHAEL L. BAKER

between on or about November 28, 2010, and on or about January 22, 2011, in the Township of Winslow, in the County of Camden, in the City of Bridgeton, in the County of Cumberland, elsewhere, and within the jurisdiction of this Court, did photograph or film a child, namely A.B. and/or S.C., in a prohibited sexual act, or in the simulation of such an act, as defined in N.J.S.A. 2C:24-4(b)(1), contrary to the provisions of N.J.S.A. 2C:24-4(b)(4) and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Endangering the Welfare of a Child - Third Degree)

GARY T. CRAMER

and

RACHAEL L. BAKER

between on or about November 28, 2010, and on or about January 22, 2011, in the Township of Winslow, in the County of Camden, in the City of Bridgeton, in the County of Cumberland, elsewhere, and within the jurisdiction of this Court, did engage in sexual conduct which would impair or debauch the morals of a child, namely A.B. and/or S.C., contrary to the provisions of N.J.S.A. 2C:24-4(a), and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

(Endangering the Welfare of a Child - Second Degree)

GARY T. CRAMER

and

RACHAEL L. BAKER

between on or about November 28, 2010, and on or about January 22, 2011, in the Township of Winslow, in the County of Camden, in the City of Bridgeton, in the County of Cumberland, elsewhere, and within the jurisdiction of this Court, did knowingly give, provide, mail, deliver, transfer, distribute, circulate, or disseminate, through any means, including the Internet, a photograph, film, videotape, or computer program or file, which depicted a child, namely A.B. and/or S.C., engaging in a prohibited sexual act, or simulation of such an act, as defined by N.J.S.A. 2C:24-4(b)(1), contrary to the provisions of N.J.S.A. 2C:24-4(b)(5)(a), and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Endangering the Welfare of a Child - Fourth Degree)

GARY T. CRAMER

and

RACHAEL L. BAKER

between on or about November 28, 2010, and on or about February 16, 2011, in the Township of Winslow, in the County of Camden, in the City of Bridgeton, in the County of Cumberland, elsewhere, and within the jurisdiction of this Court, did knowingly possess or knowingly view any photograph, film, videotape, computer program or file, video game or any other reproduction or reconstruction which depicted a child engaging in a prohibited sexual act, as defined by N.J.S.A. 2C:24-4(b)(1), contrary to the provisions of N.J.S.A. 2C:24-4(b)(5)(b), and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Endangering the Welfare of a Child - Second Degree)

GARY T. CRAMER

and

RACHAEL L. BAKER

between on or about November 28, 2010, and on or about January 22, 2011, in the Township of Winslow, in the County of Camden, in the City of Bridgeton, in the County of Cumberland, elsewhere, and within the jurisdiction of this Court, did cause or permit a child, namely A.B., to engage in a prohibited sexual act or in the simulation of such an act, as defined by N.J.S.A. 2C:24-4(b)(1), when said GARY T. CRAMER and RACHAEL L. BAKER, knew, had reason to know, or intended that the prohibited act may be photographed or filmed, contrary to the provisions of N.J.S.A. 2C:24-4(b)(3) and against the peace of this State, the government and dignity of the same.

COUNT TEN

(Endangering the Welfare of a Child - Second Degree)

GARY T. CRAMER

and

RACHAEL L. BAKER

between on or about November 28, 2010, and on or about January 22, 2011, in the Township of Winslow, in the County of Camden, in the City of Bridgeton, in the County of Cumberland, elsewhere, and within the jurisdiction of this Court, did photograph or film a child, namely A.B., in a prohibited sexual act, or in the simulation of such an act, as defined in N.J.S.A. 2C:24-4(b)(1), contrary to the provisions of N.J.S.A. 2C:24-4(b)(4) and against the peace of this State, the government and dignity of the same.

COUNT ELEVEN

(Endangering the Welfare of a Child - Third Degree)

GARY T. CRAMER

and

RACHAEL L. BAKER

between on or about November 28, 2010, and on or about January 22, 2011, in the Township of Winslow, in the County of Camden, in the City of Bridgeton, in the County of Cumberland, elsewhere, and within the jurisdiction of this Court, did engage in sexual conduct which would impair or debauch the morals of a child, namely A.B., contrary to the provisions of N.J.S.A. 2C:24-4(a), and against the peace of this State, the government and dignity of the same.

COUNT TWELVE

(Endangering the Welfare of a Child - Second Degree)

GARY T. CRAMER

and

RACHAEL L. BAKER

between on or about November 28, 2010, and on or about January 22, 2011, in the Township of Winslow, in the County of Camden, in the City of Bridgeton, in the County of Cumberland, elsewhere, and within the jurisdiction of this Court, did knowingly give, provide, mail, deliver, transfer, distribute, circulate, or disseminate, through any means, including the Internet, a photograph, film, videotape, or computer program or file, which depicted a child, namely A.B., engaging in a prohibited sexual act, or simulation of such an act, as defined by N.J.S.A. 2C:24-4(b)(1), contrary to the provisions of N.J.S.A. 2C:24-4(b)(5)(a), and against the peace of this State, the government and dignity of the same.

COUNT THIRTEEN

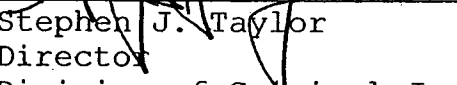
(Endangering the Welfare of a Child - Fourth Degree)

GARY T. CRAMER

and

RACHAEL L. BAKER

between on or about November 28, 2010, and on or about February 16, 2011, in the Township of Winslow, in the County of Camden, in the City of Bridgeton, in the County of Cumberland, elsewhere, and within the jurisdiction of this Court, did knowingly possess or knowingly view any photograph, film, videotape, computer program or file, video game or any other reproduction or reconstruction which depicted a child engaging in a prohibited sexual act, as defined by N.J.S.A. 2C:24-4(b)(1), contrary to the provisions of N.J.S.A. 2C:24-4(b)(5)(b), and against the peace of this State, the government and dignity of the same.



Stephen J. Taylor
Director
Division of Criminal Justice

A TRUE BILL:



, Foreperson

Dated: 6/28/11

FILED

JUN 28 2011

**SUPERIOR COURT
CLERK'S OFFICE**

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ607-11-4

Superior Court

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STATE OF NEW JERSEY)

v.)

ORDER OF VENUE

GARY T. CRAMER)

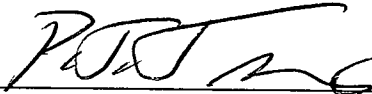
and)

RACHAEL L. BAKER)

An Indictment having been returned to this Court by the State Grand Jury in the above captioned matter,

IT IS ORDERED on this 28th day of June, 2011, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Camden be and hereby is designated as the County of venue for the purpose of trial.

IT IS FURTHER ORDERED that the Clerk of the Superior Court shall transmit forthwith the Indictment in this matter and a certified copy of this Order to the Criminal Division Manager of the County of Camden for filing.



Pedro J. Jimenez, Jr., J.S.C.